

Before the  
Federal Communications Commission  
Washington, DC 20554

In the Matter of )  
 )  
Implementation of Short-Term Analog Flash )  
and Emergency Readiness Act; Establishment ) MB Docket No. 08-255  
of DTV Transition "Analog Nightlight" )  
Program )  
 )  
 )

To: The Commission

**REPLY COMMENTS OF BONNEVILLE INTERNATIONAL CORPORATION**

Bonneville International Corporation ("Bonneville"), by its attorneys, hereby files reply comments on the Notice of Proposed Rulemaking ("NPRM") in the above-captioned proceeding.<sup>1</sup> Bonneville is a diversified media company that operates KSL-TV and KSL-DT, Salt Lake City, which is licensed to its affiliate, Bonneville Holding Company.

KSL-TV, operating on analog Channel 5 in Salt Lake City, appears on Appendix A to the NPRM as pre-approved for the proposed Analog Nightlight program. By these reply comments, Bonneville informs the Commission that KSL-TV intends to participate in the program and will file an application for Legal Special Temporary Authority ("STA") in accordance with the procedures eventually adopted by the Commission.

By these reply comments, Bonneville also expresses its support for the initial comments filed January 5, 2009, by the Named State Broadcasters Associations. In particular, Bonneville

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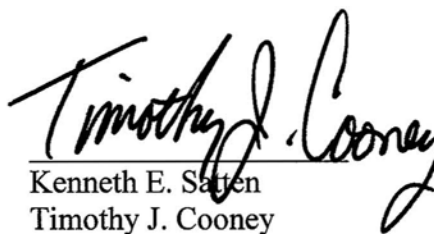
<sup>1</sup> *Implementation of Short-Term Analog Flash and Emergency Readiness Act; Establishment of DTV Transition "Analog Nightlight" Program, Notice of Proposed Rulemaking, FCC 08-281 (rel. Dec. 24, 2008).*

supports their proposal that the FCC reduce unnecessary paperwork and station expense by not requiring stations that voluntarily choose to participate in the Analog Nightlight program to update their FCC Form 387 in addition to filing a Legal STA. Additionally, given the cost of continuing to transmit in the analog mode, the FCC needs to reconsider its tentative conclusion that stations may not air sponsorships or short-form commercial spots, including banners and crawls, during their participation in the Analog Nightlight program.

Respectfully submitted,

**BONNEVILLE INTERNATIONAL  
CORPORATION**

By:

  
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*Its Attorneys*

January 8, 2009